

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

KEITH BELL,
Plaintiff,

v.

EAGLE MOUNTAIN SAGINAW
INDEPENDENT SCHOOL DISTRICT
Defendant.

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CIVIL ACTION NO. 4:20-cv-1157-P

APPENDIX

DECLARATION OF KELLEY L. KALCHTHALER

1. My name is Kelley L. Kalchthaler. I am over 18 years of age. I am of sound mind, capable of making this Declaration, and fully competent to testify to the matters stated in this Declaration. I have personal knowledge over each of the matters stated in this Declaration, and each of the matters stated in this Declaration is true and correct.

2. I am an attorney licensed to practice law in the state of Texas. I am a Shareholder in the law firm of Walsh Gallegos Treviño Kyle & Robinson P.C. in Austin, Texas. I represent Defendant Eagle Mountain-Saginaw Independent School District (“EMSISD” or “District”) as its attorney of record in the above-captioned litigation.

3. My background, training, and experience qualify me to testify to the reasonableness and necessity of the fees and costs in this case, as well as whether equity and justice would be served by an award of fees and costs to the District. I have been a full-time practicing attorney for over ten (10) years. I am a graduate of the University of Texas School of Law, and I have practiced in Texas for my entire career. I have defended school districts and private entities throughout Texas. I was licensed to practice law by the state of Texas in November 2010, and have maintained

my license since that time. I am admitted to practice before the Fifth Circuit and before the Northern, Southern, Eastern, and Western Districts of Texas.

4. As part of my practice, I have defended copyright claims and other civil rights matters throughout my career. For the entire 10 years of my career, my practice has focused almost exclusively on the representation of public school districts. My practice includes representing school districts and their employees at trial and on appeal in both state and federal court.

5. My co-counsel, Ms. Meredith Prykyrl Walker, is also a full-time practicing attorney and has been so for over 14 years. She is a graduate of Southern Methodist University Dedman School of Law, and she has practiced in Texas for her entire legal career. She has likewise defended school districts and private entities throughout Texas. She was licensed to practice law by the state of Texas on November 3, 2006, and has maintained her license since that time. She is admitted to practice before the United States Supreme Court, Fifth Circuit, Northern, Southern, Eastern, and Western Districts of Texas. Ms. Walker practices in Walsh Gallegos' Irving office.

6. As part of her practice, Ms. Walker has represented clients in copyright claims and other civil rights matters throughout her career. For the past ten (10) years of her career, her practice has focused almost exclusively on the representation of public school districts in litigation, although she has been representing public school districts since 2008. Her practice includes representing school districts and their employees at trial and on appeal in both state and federal court. Prior to focusing exclusively on the representation of school districts, she handled general litigation matters involving professional liability. Prior to joining Walsh Gallegos, she worked as an associate attorney for Henslee Schwartz LLP and Fisher Phillips LLP.

7. I make this Declaration from personal knowledge and the attorney fee bills attached to this Declaration. I submit this Declaration in support of EMSISD's request for attorneys' fees

in this matter in accordance with 17 U.S.C. §505 and as ordered by the Court in Docket Entry (“DE”) 19. We both maintained time entries directly electronically, and all entries were made contemporaneously through an electronic system.

8. In this matter, Walsh Gallegos charged either \$225 per hour per \$205 per hour for attorney/shareholders working on this lawsuit. Walsh Gallegos also charged \$95 for paralegal services provided by Ms. Lucy Skiles and Ms. Evelyn Garnett. The fees charged to EMSISD are those customarily charged in this area for the same or similar services by an attorney with the experience, reputation, and ability of the attorneys with Walsh Gallegos retained by the District, considering the nature of the controversy, the time limits imposed, the results obtained compared with results in similar cases, and the nature and length of my relationship with Eagle Mountain-Saginaw Independent School District. The rates for these fees are reasonable for the services performed, and are in line with the State of Texas Department of Research & Analysis 2015 Hourly Fact Sheet, available at https://www.texasbar.com/AM/Template.cfm?Section=demographic_and_economic_trends&Template=/CM/ContentDisplay.cfm&ContentID=34182.

9. I am also familiar with the experience, reputation, and abilities of my co-counsel, Ms. Walker. A summary of her background and experience is above, and I am familiar with how Ms. Walker keeps time. Specifically, she keeps her time contemporaneously in electronic copy and then transfers it to the firm’s electronic system. All services performed for EMSISD in connection with the lawsuit were reasonable and necessary to provide a defense to the allegations brought by Plaintiff. I declare under penalty of perjury that the foregoing is true and correct.”

Signed on this 2nd day of April, 2021.


KELLEY L. KALCHTHALER



WALSH GALLEGOS
TREVINO KYLE & ROBINSON P.C.

P.O. Box 2156 Austin, Texas 78768 (512)454-6864 Fax (512)467-9318
Federal Tax ID No.: 74-2279224

Edwards Risk Management Fund
1004 Marble Heights Drive
Marble Falls, Texas 78654

Attention: Larry Harper, Property & Casualty Director

December 02, 2020
Client: 07570
Matter: 000129
Invoice #: 600331

Page: 1

RE: Keith F. Bell v. Eagle Mountain Saginaw ISD (Fed.)
Edwards Claim No. 220918-13901
Insured: Eagle Mt. - Saginaw ISD
Claimant: Keith F. Bell

For Professional Services Rendered Through November 15, 2020

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
11/2/2020	KLK	Telephone conference with PCAT Claims Representative, [REDACTED], regarding [REDACTED].	0.3	\$225.00	\$67.50
11/5/2020	KLK	Review and analyze pleadings in lawsuit and consider [REDACTED].	0.4	\$225.00	\$90.00
11/5/2020	KLK	Prepare e-mail to Chief Financial Officer, [REDACTED], regarding [REDACTED].	0.2	\$225.00	\$45.00
11/5/2020	KLK	Telephone conference with D. Micknal with law firm of Leasor Crass, P.C. regarding underlying case file and relevant factual background history.	0.2	\$225.00	\$45.00
11/6/2020	KLK	Revise and edit draft of [REDACTED].	0.7	\$225.00	\$157.50
11/10/2020	KLK	Telephone conference with PCAT Claims Representative, [REDACTED], regarding [REDACTED].	0.1	\$225.00	\$22.50
11/11/2020	KLK	Prepare e-mail to Opposing Counsel regarding waiver of service.	0.1	\$225.00	\$22.50
11/11/2020	KLK	Prepare follow-up e-mail to Chief Financial Officer and PCAT Claims Representative, [REDACTED], regarding [REDACTED].	0.1	\$225.00	\$22.50

Docket # 02-0020
 Client: 07570
 Matter: 000129
 Invoice #: 600331

Page: 2

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
		Total Professional Services	2.1		\$472.50

PERSON RECAP

Person	Level	Hours	Rate	Amount
KLK Kelley Kalchthaler	SHAREHOLDER	2.1	\$225.00	\$472.50
	Total Services		\$472.50	
	Total Current Charges			\$472.50
	PAY THIS AMOUNT			\$472.50

PAYMENT DUE UPON RECEIPT

Please note that as of April 1, 2021, our name has changed as listed below; by separate email, you will receive an updated W-9.

Please reference the invoice number with your payment and make checks payable to:

Walsh Gallegos Treviño Kyle & Robinson P.C.

Please contact the Billing Department at (512) 454-6864 if you have any questions regarding your statement.


WALSH GALLEGOS
 TREVIÑO KYLE & ROBINSON P.C.

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 Federal Tax ID No.: 74-2279224

Edwards Risk Management Fund
 1004 Marble Heights Drive
 Marble Falls, Texas 78654

Attention: Larry Harper, Property & Casualty Director

January 02, 2021

Client: 07570

Matter: 000129

Invoice #: 602006

Page: 1

RE: Keith F. Bell v. Eagle Mountain Saginaw ISD (Fed.)

Edwards Claim No. 220918-13901

Insured: Eagle Mt. - Saginaw ISD

Claimant: Keith F. Bell

For Professional Services Rendered Through December 15, 2020

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
11/16/2020	KLK	Revise and finalize [REDACTED].	0.3	\$225.00	\$67.50
11/16/2020	KLK	Revise, edit and finalize [REDACTED].	0.6	\$225.00	\$135.00
11/23/2020	KLK	Exchange e-mail with Opposing Counsel, W. Norred, regarding waiver of service.	0.2	\$225.00	\$45.00
11/23/2020	KLK	Prepare, revise and finalize [REDACTED].	0.6	\$225.00	\$135.00
12/3/2020	KLK	Videoconference with Superintendent and Chief Financial Officer regarding [REDACTED].	0.7	\$225.00	\$157.50
12/3/2020	KLK	Follow-up with e-mail correspondence and text message regarding [REDACTED] to Interim Superintendent and Chief Financial Officer regarding [REDACTED].	0.2	\$225.00	\$45.00
12/3/2020	KLK	Exchange e-mails with Director of Communications, [REDACTED], regarding [REDACTED].	0.2	\$225.00	\$45.00

Client: 07570

Matter: 000129

Invoice #: 602006

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SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
12/7/2020	KLK	Review and finalize Waiver of Service of Summons and ensure proper transmittal of same.	0.2	\$225.00	\$45.00
12/8/2020	KLK	Review of additional cases filed by Claimant K. Bell to evaluate case.	0.4	\$225.00	\$90.00
12/8/2020	KLK	Videoconference with Director of Communications, [REDACTED], regarding [REDACTED]	0.8	\$225.00	\$180.00
12/10/2020	KLK	Prepare, revise, and edit executive summary to Board regarding [REDACTED].	0.7	\$225.00	\$157.50
Total Professional Services			4.9		\$1,102.50

PERSON RECAP

Person	Level	Hours	Rate	Amount
KLK Kelley Kalchthaler	SHAREHOLDER	4.9	\$225.00	\$1,102.50
Total Services			\$1,102.50	
Total Current Charges				\$1,102.50
Previous Balance				\$472.50
Payments received				(\$472.50)
PAY THIS AMOUNT				\$1,102.50

PAYMENT DUE UPON RECEIPT

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Federal Tax ID No.: 74-2279224

Edwards Risk Management Fund
1004 Marble Heights Drive
Marble Falls, Texas 78654

Attention: Larry Harper, Property & Casualty Director

February 02, 2021

Client: 07570

Matter: 000129

Invoice #: 602248

Page: 1

RE: Keith F. Bell v. Eagle Mountain Saginaw ISD (Fed.)

Edwards Claim No. 220918-13901

Insured: Eagle Mt. - Saginaw ISD

Claimant: Keith F. Bell

For Professional Services Rendered Through January 15, 2021

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
12/18/2020	KLK	Review and analyze Northern District of Zyas' Local rules regarding motions to ensure compliance with same for dispositive motions.	0.2	\$205.00	\$41.00
12/18/2020	KLK	Initiate preparation of draft of Defendant's Motion to Dismiss under Rule 12(b)(1) and (b)(6) and Brief in Support.	0.5	\$205.00	\$102.50
1/1/2021	KLK	Continue to prepare Defendant's Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12, including review of case law related to same.	3.2	\$205.00	\$656.00
1/7/2021	KLK	Continue to prepare Defendant's Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12, including additional case law related to de minimis and innocent infringement defenses.	1.3	\$205.00	\$266.50
1/8/2021	KLK	Review and analyze case law and rules related to declaratory judgment action in context of copyright claims.	1.9	\$205.00	\$389.50
1/8/2021	KLK	Revise, edit and finalize Defendant's Brief in Support of its Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12.	3.1	\$205.00	\$635.50
1/8/2021	KLK	Revise, edit, and finalize Defendant's Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12.	1.2	\$205.00	\$246.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
1/8/2021	KLK	Prepare, revise, and edit Defendant's Answers subject to its Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12.	3.5	\$205.00	\$717.50
1/8/2021	KLK	Prepare proposed order granting Defendant's Motion to Dismiss.	0.1	\$205.00	\$20.50
1/8/2021	KLK	Prepare, revise, and edit court-mandated Certificate of Interested Parties, including review of underlying files to prepare same.	0.6	\$205.00	\$123.00
1/12/2021	KLK	Prepare detailed e-mail to Superintendent regarding [REDACTED]	0.5	\$205.00	\$102.50
1/13/2021	KLK	Exchange e-mail with Superintendent regarding [REDACTED]	0.2	\$205.00	\$41.00
1/13/2021	KLK	Receive and review e-mails from Director of Communications, [REDACTED], follow-up with e-mail regarding [REDACTED].	0.2	\$205.00	\$41.00
1/13/2021	LPS	Review and organize District documents and save to electronic file.	0.5	\$95.00	\$47.50
Total Professional Services			17.0		\$3,430.00

PERSON RECAP

Person	Level	Hours	Rate	Amount
KLK Kelley Kalchthaler	SHAREHOLDER	16.5	\$205.00	\$3,382.50
LPS Lucy P. Skiles	PARALEGAL	0.5	\$95.00	\$47.50
Total Services			\$3,430.00	
Total Current Charges				\$3,430.00
Previous Balance				\$1,102.50
Payments received				(\$1,102.50)
PAY THIS AMOUNT				\$3,430.00

February 12, 2021
Client: 07570
Matter: 000129
Invoice #: 602248

Page: 3

PAYMENT DUE UPON RECEIPT

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P.O. Box 2156 Austin, Texas 78768 (512)454-6864 Fax (512)467-9318
 Federal Tax ID No.: 74-2279224

Edwards Risk Management Fund
 1004 Marble Heights Drive
 Marble Falls, Texas 78654

Attention: Larry Harper, Property & Casualty Director

March 02, 2021

Client: 07570

Matter: 000129

Invoice #: 605239

Page: 1

RE: Keith F. Bell v. Eagle Mountain Saginaw ISD (Fed.)

Edwards Claim No. 220918-13901

Insured: Eagle Mt. - Saginaw ISD

Claimant: Keith F. Bell

For Professional Services Rendered Through February 15, 2021

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
1/29/2021	KLK	Review incorrect notice from Court regarding unfiled for lack of local counsel and consider next steps to correct Court's mistake.	0.4	\$225.00	\$90.00
1/29/2021	KLK	Prepare notice to Court regarding incorrect filing and compliance with local rules regarding local counsel based on MPW's inclusion as counsel.	0.4	\$225.00	\$90.00
1/31/2021	KLK	Review e-mail correspondence from Opposing Counsel regarding court's erroneous action to strike Motion to Dismiss based on misunderstanding of location of counsel and consider response and next steps regarding same.	0.3	\$225.00	\$67.50
2/1/2021	KLK	Initiate discussions with court clerk regarding correction of record and deadline to file response.	0.5	\$225.00	\$112.50
2/2/2021	KLK	Receive and review court order regarding court error to strike and new response and reply deadlines.	0.2	\$225.00	\$45.00
2/2/2021	KLK	Receive, review, and begin to analyze Plaintiff's response in opposition to Defendant's Motion to Dismiss.	0.5	\$225.00	\$112.50
2/5/2021	KLK	Review and analyze Bell v. Oakland Community Pools Project for use in settlement discussions in instant suit.	0.5	\$225.00	\$112.50

March 09, 2021
Client: 07570

Matter: 000129

Invoice #: 605239

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SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
2/7/2021	KLK	Begin to prepare Defendant's Reply to Plaintiff's Response in opposition to its Motion to Dismiss.	2.9	\$225.00	\$652.50
2/7/2021	KLK	Receive and review Court Order regarding Scheduling Conference and required in-person Rule 26(f) conferences and consider strategy related to same in light of pandemic.	0.4	\$225.00	\$90.00
2/8/2021	KLK	Continue to prepare Defendant's Reply to Plaintiff's Response in opposition to its Motion to Dismiss, including review of cases cited by Plaintiff.	2.8	\$225.00	\$630.00
2/8/2021	KLK	Review and analyze case strategy and consider next steps for same.	0.4	\$225.00	\$90.00
2/8/2021	KLK	Prepare e-mail to PCAT Claims Representative, [REDACTED], regarding [REDACTED].	0.3	\$225.00	\$67.50
2/8/2021	KLK	Revise and finalize Defendant's Reply to Plaintiff's Response to its Motion to Dismiss.	1.1	\$225.00	\$247.50
2/8/2021	MPW	Plan and prepare for the Rule 26(f) conference with Opposing Counsel.	0.5	\$205.00	\$102.50
2/8/2021	MPW	Review the Court's Order regarding a Rule 26(f) conference.	0.2	\$205.00	\$41.00
2/8/2021	MPW	Prepare and send e-mail correspondence to Opposing Counsel regarding the Rule 26(f) conference.	0.1	\$205.00	\$20.50
2/9/2021	KLK	Exchange e-mail with Director of Communications regarding [REDACTED].	0.2	\$225.00	\$45.00
2/9/2021	KLK	Telephone conference with MPW and PCAT Claims Representative, [REDACTED], regarding [REDACTED].	0.4	\$225.00	\$90.00
2/9/2021	MPW	Prepare and send e-mail correspondence to Opposing Counsel regarding the Rule 26(f) conference.	0.1	\$205.00	\$20.50
2/9/2021	MPW	Telephone conference with the Claims Representative and KLK regarding [REDACTED].	0.4	\$205.00	\$82.00
2/14/2021	KLK	Prepare, revise and edit Joint Motion for Leave to Meet Via Videoconference or in the Alternative to Extend Deadline for Meeting and Rule 26(f) Report, including proposed order regarding same.	0.5	\$225.00	\$112.50
2/14/2021	MPW	Prepare and send e-mail correspondence to Opposing Counsel regarding the Rule 26(f) conference.	0.1	\$205.00	\$20.50

March 09, 2021
Client: 07570

Matter: 000129

Invoice #: 605239

Page: 3

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
2/15/2021	KLK	Exchange e-mails with Opposing Counsel regarding joint motion to meet in person or in the alternative to extend deadlines.	0.2	\$225.00	\$45.00
2/15/2021	KLK	Prepare e-mail update to PCAT Claims Representative, [REDACTED], regarding [REDACTED]	0.3	\$225.00	\$67.50
2/15/2021	KLK	Exchange e-mail correspondence with Opposing Counsel regarding revisions to Motion for Leave or to extend related to power outages and possible additional time to meet by videoconference.	0.2	\$225.00	\$45.00
2/15/2021	KLK	Revise and edit Joint Motion for Leave to Meet Via Videoconference or in the Alternative to Extend Deadline for Meeting and Rule 26(f) Report, including proposed order regarding same.	0.2	\$225.00	\$45.00
Total Professional Services			14.1		\$3,144.50

PERSON RECAP

Person	Level	Hours	Rate	Amount
KLK Kelley Kalchthaler	SHAREHOLDER	12.7	\$225.00	\$2,857.50
MPW Meredith Prykryl Walker	SHAREHOLDER	1.4	\$205.00	\$287.00
Total Services			\$3,144.50	
Total Current Charges				\$3,144.50
Previous Balance				\$3,430.00
Payments received				(\$3,430.00)
PAY THIS AMOUNT				\$3,144.50

PAYMENT DUE UPON RECEIPT

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WALSH GALLEGOS
 TREVIÑO KYLE & ROBINSON P.C.

P.O. Box 2156 Austin, Texas 78768 (512)454-6864 Fax (512)467-9318
 Federal Tax ID No.: 74-2279224

Draft Copy

Edwards Risk Management Fund
 1004 Marble Heights Drive
 Marble Falls, Texas 78654

Attention: Larry Harper, Property & Casualty Director

April 02, 2021

Client: 07570

Matter: 000129

Invoice #: 0

Page: 1

RE: Keith F. Bell v. Eagle Mountain Saginaw ISD (Fed.)

Edwards Claim No. 220918-13901

Insured: Eagle Mt. - Saginaw ISD

Claimant: Keith F. Bell

For Professional Services Rendered Through April 02, 2021

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
2/17/2021	MPW	Review the Court's Order granting the parties' request to extend the Rule 26(f) conference.	0.1	\$205.00	\$20.50
2/18/2021	MPW	Prepare and send e-mail correspondence to Opposing Counsel regarding the Rule 26(f) conference.	0.1	\$205.00	\$20.50
2/19/2021	KLK	Review status for Board meeting [REDACTED]	0.4	\$225.00	\$90.00
2/22/2021	KLK	Prepare e-mail to Superintendent regarding [REDACTED]	0.2	\$225.00	\$45.00
2/22/2021	MPW	Prepare and send e-mail correspondence to Opposing Counsel regarding the Rule 26(f) conference.	0.1	\$205.00	\$20.50
2/23/2021	MPW	Review and respond to e-mail correspondence from Opposing Counsel regarding the 26(f) conference.	0.1	\$205.00	\$20.50
2/23/2021	MPW	Review a draft 26(f) report received from Opposing Counsel.	0.2	\$205.00	\$41.00
2/23/2021	MPW	Plan, prepare for, and attend the 26(f) conference with Opposing Counsel.	0.8	\$205.00	\$164.00
2/23/2021	MPW	[Travel Time Billed at 1/2 Rate] Travel to and from Arlington for the 26(f) conference with Opposing Counsel.	0.9	\$102.50	\$92.25

Client: 07570

Matter: 000129

Invoice #: 0

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SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
2/24/2021	KLK	Revise and edit Joint Status Report on Rule 26(f) conference.	0.8	\$225.00	\$180.00
2/24/2021	KLK	Review update on Rule 269(f) conference.	0.3	\$225.00	\$67.50
2/24/2021	KLK	Receive and review offer of settlement from Opposing Counsel and consider strategy related to same.	0.3	\$225.00	\$67.50
2/24/2021	MPW	Review and respond to e-mail correspondence from Opposing Counsel regarding a settlement offer.	0.1	\$205.00	\$20.50
2/26/2021	KLK	Continue to revise and edit Joint Status Report based on the R26(f) conference.	0.4	\$225.00	\$90.00
2/26/2021	KLK	Prepare e-mail to Opposing Counsel regarding Joint Status Report based on the Rule 26(f) conference and finalizing same.	0.2	\$225.00	\$45.00
2/26/2021	MPW	Assist with revising the Rule 26(f) report received from Opposing Counsel.	0.2	\$205.00	\$41.00
3/2/2021	KLK	Initiate preparation of Initial Disclosures, including draft of persons with knowledge list.	0.5	\$225.00	\$112.50
3/2/2021	KLK	Follow-up with Opposing Counsel regarding joint status report and finalizing same.	0.1	\$225.00	\$22.50
3/2/2021	EJG	Review Petitioner's original complaint in order to prepare initial disclosures.	0.4	\$95.00	\$38.00
3/3/2021	KLK	Exchange e-mail correspondence with Opposing Counsel regarding revisions to Joint Status Report.	0.3	\$225.00	\$67.50
3/3/2021	KLK	Revise and edit draft of Joint Status Report and finalize same, including review of proper submission and notice regarding filing of same.	0.4	\$225.00	\$90.00
3/3/2021	KLK	Prepare e-mail update to PCAT Claims Representative, [REDACTED], regarding [REDACTED]	0.2	\$225.00	\$45.00
3/3/2021	EJG	Review file pleadings and reports in preparation for initial disclosures.	0.7	\$95.00	\$66.50
3/3/2021	EJG	Internet research for prospective District witness information for initial disclosures and list same for exhibit to disclosures.	0.7	\$95.00	\$66.50
3/4/2021	EJG	Finalize draft disclosures and witness list and e-mail same to attorney for review.	1.2	\$95.00	\$114.00
3/8/2021	KLK	Exchange e-mail correspondence with [REDACTED], Executive Assistant to Superintendent and Secretary to Board of Trustees, regarding [REDACTED].	0.2	\$225.00	\$45.00

Client: 07570

Matter: 000129

Invoice #: 0

Draft Copy

Page: 3

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
3/8/2021	KLK	Exchange e-mail with Superintendent regarding [REDACTED]	0.2	\$225.00	\$45.00
3/8/2021	KLK	Videoconference with Superintendent, [REDACTED], and [REDACTED] regarding [REDACTED]	0.3	\$225.00	\$67.50
3/10/2021	KLK	Follow-up with PCAT Claims Representative, [REDACTED], regarding [REDACTED]	0.2	\$225.00	\$45.00
3/10/2021	MPW	Attend Zoom conference with KLK and the Superintendent regarding [REDACTED]	0.3	\$205.00	\$61.50
3/10/2021	MPW	Plan and prepare strategy for presenting the [REDACTED]	0.2	\$205.00	\$41.00
3/16/2021	KLK	Prepare, revise and finalize counteroffer of settlement.	0.3	\$205.00	\$61.50
3/23/2021	KLK	Exchange email with Executive Assistant to Superintendent/Secretary to the Board of Trustees regarding [REDACTED]	0.2	\$205.00	\$41.00
3/23/2021	KLK	Exchange email with Opposing Counsel regarding settlement counteroffer.	0.2	\$205.00	\$41.00
3/24/2021	KLK	Exchange email with PCAT Claims Representative, [REDACTED], regarding [REDACTED]	0.3	\$205.00	\$61.50
3/26/2021	KLK	Receive and review order dismissing case and consider next steps.	0.2	\$205.00	\$41.00
3/26/2021	KLK	Exchange email with Opposing Counsel regarding withdrawal of settlement offer.	0.1	\$205.00	\$20.50
3/26/2021	KLK	Prepare [REDACTED] to PCAT Claims Representative, [REDACTED].	0.2	\$205.00	\$41.00
3/26/2021	KLK	Prepare [REDACTED] to Superintendent regarding [REDACTED]	0.2	\$205.00	\$41.00
3/26/2021	MPW	Review the Court's Order dismissing Plaintiff's claims.	0.2	\$225.00	\$45.00
3/29/2021	KLK	Begin to prepare motion for attorneys fees.	0.4	\$205.00	\$82.00
3/30/2021	KLK	Initiate preparation of affidavits regarding attorneys fees.	0.3	\$205.00	\$61.50
3/31/2021	KLK	Continue to prepare motion seeking attorneys fees.	0.3	\$205.00	\$61.50

Client: 07570

Matter: 000129

Invoice #: 0

Draft Copy

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SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
		Total Professional Services	14.0		\$2,551.75

PERSON RECAP

Person	Level	Hours	Rate	Amount
KLK Kelley Kalchthaler	SHAREHOLDER	2.7	\$205.00	\$553.50
KLK Kelley Kalchthaler	SHAREHOLDER	5.0	\$225.00	\$1,125.00
MPW Meredith Prykryl Walker	SHAREHOLDER	0.2	\$225.00	\$45.00
MPW Meredith Prykryl Walker	SHAREHOLDER	2.2	\$205.00	\$451.00
MPW Meredith Prykryl Walker	SHAREHOLDER	0.9	\$102.50	\$92.25
EJG Evelyn J. Garnett	PARALEGAL	3.0	\$95.00	\$285.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
2/23/2021	MEREDITH WALKER- Mileage (at .56/mile)- (27 @ \$0.56)	\$15.12
	Total Disbursements	\$15.12
	Total Services	\$2,551.75
	Total Disbursements	\$15.12
	Total Current Charges	\$2,566.87
	Previous Balance	\$3,144.50
	Payments received	(\$3,144.50)
	PAY THIS AMOUNT	\$2,566.87

PAYMENT DUE UPON RECEIPT

Please note that as of April 1, 2021, our name has changed as listed below; by separate email, you will receive an updated W-9.

Please reference the invoice number with your payment and make checks payable to:

Walsh Gallegos Treviño Kyle & Robinson P.C.

Please contact the Billing Department at (512) 454-6864 if you have any questions regarding your statement.